

ATTACHMENT NINE

Project Officer Off-Site/On-Site Review Guidance and Protocol

*Unlike the administrative reviews conducted by the Grants Management Offices (i.e., that which focus on the recipient institution's financial, personnel, property and procurement records, systems and procedures), **Project Officers are responsible for performing programmatic reviews (i.e., that which pertains to the goals, objectives and activities reflected in the assistance agreement).***

PRIOR TO CONDUCTING THE ON-SITE OR OFF-SITE EVALUATION, Project Officers must:

- Review the workplan under the signed assistance agreement, the recipient's progress reports and any products produced under the agreement to date
- Review the Federal role under the agreement (including the collaborative activities, schedules, comments and approvals for which the Project Officer had the responsibility)
- Identify the issues that require resolution during the visit
- Send a letter to the recipient confirming the date and scope of review (Appendix B)
- Assess whether the recipient's progress is commensurate with payments made by EPA
- Review the recipient's grant payment history at http://oasint.rtpnc.epa.gov/neis/grant_web.grant_inquiry (Instructions appear in Appendix A)
- Assess whether the grantee met any or all the programmatic reporting requirements
- Gather all pertinent information for the visit

AFTER THE EVALUATION, Project Officers must:

- File a report which:
 - Summarizes Project Officer observations and conclusions in each of the core areas
 - Explains how the issues were resolved during the review
 - Discusses how and when outstanding issues will be resolved
 - Includes milestones and next steps
- Send a letter to the recipient summarizing the findings, resolved and unresolved issues and EPA/ recipient commitments
- Work with the GMO to initiate any necessary grant amendments (e.g., scope or budget revisions)
- Seek and document assistance from senior management or the Grants Office for unresolved issues

Project Officers may use this document in their efforts to develop a report.

To ensure that progress is being made to meet the original goal and objective of the assistance agreement and that activities are carried out according to applicable statutes, regulations, and policies. Project Officers must contact their Grants Office immediately if the recipient shows unreasonably slow progress or does not comply with the provisions in the grant agreement. If there is reason to believe that the grantee has committed or commits fraud, waste and/or abuse, then the Project Officer must contact the Office of the Inspector General.

For questions regarding this document, please contact your office point of contact.

BACKGROUND INFORMATION

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7. SCOPE OF REVIEW

To evaluate the status of the PWSS Program including a review of the DWSRF Set-aside funded activities, the Water Protection Coordination Grant and the Operator Certification Expense Reimbursement Grant commitments and activities.

EPA PROJECT OFFICER POST-AWARD EVALUATION PROTOCOL

Modified for use in the Drinking Water Program

NOTE: To prevent potential problems with the Paperwork Reduction Act, Project Officers should not give this protocol to the recipient or direct the issues as questions to the recipient.

Project Officers will place this form in each grant file to reflect that Post Award Advanced Monitoring has occurred.

1. FINANCIAL

Project Officers are responsible for:

- Analyzing the budget information in the reports by reviewing the payment history (using recipient progress reports, Financial Status Reports, or IFMS reports) and comparing actual amounts spent against the planned budget in the workplan.
- Providing rebudget approval to the Grants Specialist on the recipient's request to rebudget grant funds or on other actions which require prior approval from EPA.

2. TECHNICAL

Project Officers are responsible for:

- Monitoring all activities and the recipient's progress on the project.
- Providing comments to the recipient on the progress reports and other work products.
- Apprising program staff who are responsible for parts of the project/program on issues which need resolution.
- Recommending actions that require the attention of the Grants Management Office, the Office of General (or Regional) Counsel and the Quality Assurance/Quality Control contact.

1. The PO should determine if...

	Yes	No
...the payment history is consistent with the progress to date.	X	<input type="checkbox"/>
...additional funds are required to meet the objectives.	<input type="checkbox"/>	X

2. The PO should determine if...

	Yes	No
...the work under the agreement is on schedule.	X	<input type="checkbox"/>
...work being performed is within the scope of the workplan	X	<input type="checkbox"/>
...staff and facilities are appropriate to handle the work under the agreement.	X	<input type="checkbox"/>
...products/progress reports are being submitted on time and are acceptable.	X	<input type="checkbox"/>

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3. AGREEMENT-SPECIFIC

Project Officers are responsible for:

- Reviewing progress reports and other work products to assure that the recipient is complying with the applicable regulations and the programmatic terms and conditions in the agreement.
- Notifying the GMO if the recipient is not complying with the terms and conditions of the agreement.
- Providing technical assistance to recipients when requested or required by the programmatic terms and conditions of the award.
- Assisting the recipient, where appropriate, with the development of a plan to conduct subsequent portions of the project.

NOTE: Select those areas which apply to your specific agreement.

Equipment

Property

Travel

Conferences

Program Income

Subagreements

In-Kind Services

Quality Assurance/Quality Control

Human/Animal Subjects-Not Applicable to these grants

3. As appropriate, the PO should determine if...

PROGRAM REGULATIONS/ TERMS AND CONDITIONS

Not Applicable ☐

	Yes	No
...the recipient has complied with the agreement's relevant programmatic regulations and/or programmatic terms and conditions.	X <input type="checkbox"/>	<input type="checkbox"/>

EQUIPMENT

Not Applicable ☐

	Yes	No
...the recipient purchased equipment as planned in the agreement.	<input type="checkbox"/>	X <input type="checkbox"/>

	Yes	No
...the equipment has been used as planned in the agreement.	<input type="checkbox"/>	X <input type="checkbox"/>

PROPERTY

Not Applicable X

	Yes	No
...the recipient purchased and used real property (e.g., land, buildings) as prescribed in the agreement.	<input type="checkbox"/>	<input type="checkbox"/>

TRAVEL

Not Applicable ☐

	Yes	No
...authorized travel has been carried out appropriately.	X <input type="checkbox"/>	<input type="checkbox"/>

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AGREEMENT-SPECIFIC, cont'd.

Although it is not required, Project Officers should:

- Share relevant information from the November 1998 Best Practices Guide for Conferences (Appendix I, EPA Project Officer Manual) and the Office of General Counsel's Printing Guidance (June 14, 2000) with the recipient.
- Work with the recipient to ensure that the work under a subagreement (e.g., contracts, subgrants, memoranda of understanding, and, if applicable, intergovernmental agreements under the assistance agreement) does not go beyond the scope of the assistance agreement.

NOTE: Project Officers must work with the recipient to resolve program-income related issues on agreements that generate program income.

CONFERENCES

Not Applicable X

	Yes	No
...the conference complied with the Best Practices Guide for Conferences.	<input type="checkbox"/>	<input type="checkbox"/>

SUBAGREEMENTS

Not Applicable X

	Yes	No
...subagreement's are consistent with the approved workplan.	<input type="checkbox"/>	<input type="checkbox"/>

	<input type="checkbox"/>	<input type="checkbox"/>
...the recipient reprogrammed funds to contracting.		

	<input type="checkbox"/>	<input type="checkbox"/>
...the subcontract's Statement of Work is consistent with the scope of the assistance agreement.		

	<input type="checkbox"/>	<input type="checkbox"/>
...subagreement costs charged are eligible and allocable.		

PROGRAM INCOME

Not Applicable X

	Yes	No
...the project generated unanticipated income.	<input type="checkbox"/>	<input type="checkbox"/>

HUMAN SUBJECTS

Not Applicable X

	Yes	No
...the recipient has followed the regulations under 40 CFR Part 26.	<input type="checkbox"/>	<input type="checkbox"/>

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AGREEMENT-SPECIFIC, cont'd.

Conditional approval - 06/23/05

New staff had to be trained.

QUALITY ASSURANCE/ QUALITY CONTROL

Not Applicable ☐

Yes No

...an approved Quality Assurance Management and/or Quality Assurance Project Plan (QMP/QAPP) is in place.

X ☐

...all personnel responsible for implementing the QMP/QAPP are familiar with its requirements.

X ☐

there is an audit tool and schedule to ensure that the QMP/QAPP requirements were met.

X ☐

EPA-FURNISHED IN KIND ASSISTANCE

Not Applicable X

Yes No

...was satisfactory for use in the assistance agreement.

☐ ☐

RECIPIENT-FURNISHED/ THIRD PARTY IN-KIND CONTRIBUTIONS

Not Applicable X

Yes No

...met the conditions under 40 CFR 30.23 and 40 CFR 31.24.

☐ ☐

...any adjustments were made to the cost share.

☐ ☐

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OBSERVATIONS AND CONCLUSIONS

Full details can be found in the final Report, dated __08/12/05__.

The Report has been filed in the PWSS FY 2005 grant file with a note in each grant file referencing the Report and provided to the grantee on __08/12/05__.

AREAS REQUIRING PROJECT OFFICER ASSISTANCE

Slow drawdowns for ERG and Security Grants. State has been required per mid-yr performance evaluation to show status of expenditures when submitting semi-annual progress reports. Recipient has also been made aware of funding options if it is not possible to spend full amount of the ERG - Amend grant project period for a year or roll over into the DWSRF (only 31% into set-asides, must do state match and new outputs and outcomes will apply)

AREAS REQUIRING SENIOR MANAGEMENT OR GRANTS OFFICE ASSISTANCE

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